

**SUMMARY OF THE
ENVIRONMENTAL LABORATORY ADVISORY BOARD MEETING
AUGUST 22, 2000**

The Environmental Laboratory Accreditation Board (ELAB) met on Wednesday, August 22, 2000, at 1:30 p.m. Eastern Daylight Time (EDT) by teleconference. The meeting was led by its chair, Dr. J. Wilson Hershey of Lancaster Laboratories, Inc. A list of action items is given in Attachment A. A list of participants is given in Attachment B. The meeting agenda is given in Attachment C. A summary of the current status of ELAB recommendations is given in Attachment D.

INTRODUCTION

Dr. Hershey informed ELAB that the U.S. Environmental Protection Agency (EPA) has assigned Dr. Stephen Billets as ELAB's Designated Federal Officer (DFO), and that Mr. David Friedman, the previous acting DFO, will continue to be involved on an as needed basis. At Dr. Hershey's request, Dr. Billets introduced himself to ELAB, reviewing his educational and professional experience, as well as ideas on the continued development of NELAC. It was noted that Dr. Billets is also the Acting Executive Secretary of NELAC.

REVIEW OF MINUTES

Review of the minutes of June 28, 2000 was postponed for the next meeting.

REVIEW OF ACTION ITEMS

Review of action items from previous meetings was postponed for the next meeting. Dr. Hershey noted that previous action items #7 and #12 have been completed.

OUTREACH TO STATES

Dr. Hershey introduced Ms. Ilona Taunton, of the NELAC Regulatory Coordination committee, and Mr. Paul Mills, of the NELAC Membership and Outreach committee, who have surveyed the 50 States (see previous minutes). They have found:

- 14 States plan to not apply for NELAP accreditation,
- 9 States are undecided, and
- 6 States plan to apply soon for NELAP accreditation.

Based on follow-up conversations with staff, several instances of misinformation were encountered, which the Membership and Outreach committee will address. Dr. Billets indicated that EPA would cooperate with a suitable outreach strategy to clarify and accurately explain the NELAC/NELAP Program.

Following discussion, Dr. Hershey summarized the following points:

1. individual ELAB members may make personal contacts as they deem appropriate to ensure correct understanding of the NELAC/NELAP program,
2. EPA will reiterate its commitment to the NELAC/NELAP program, and
3. the Membership and Outreach committee will be given
 - a. results of this survey, and
 - b. the white paper (see recommendation #46).

DOT/EPA REGULATIONS

Preservative pH

Mr. Friedman reviewed progress on his discussions with the Department of Transportation regarding the pH of environmental samples (DOT requires pH greater than 1.96; EPA requires specific samples be preserved at pH less than 2.0) in shipment. He noted that background documentation focuses on corrosion related to high concentrations, rather than the low concentrations common to environmental samples. He asked the laboratory community to share any available information on impacts of these low-concentration samples (e.g., on aluminum, steel, skin)

Headspace

Mr. Friedman noted that many EPA procedures require that samples have no headspace, while DOT regulations require sample headspace. He noted that environmental sample vials are packed in sealed bags inside a shipping container, and that this appears to satisfy DOT requirements. Following discussion, it was agreed that this interpretation is consistent with common practice and Mr. Friedman was encouraged to obtain formal clarification of this issue.

SUBCOMMITTEE REPORTS

Performance Based Measurement Systems (PBMS) Subcommittee

Dr. Gearhart, chair of the subcommittee-, reported that a draft of the subcommittee's critical review will be ready for presentation during ELAB's meeting in Las Vegas. Dr. Hershey reported that he has received a letter from the NELAC Board of Directors expressing EPA's interest in this effort. ELAB was requested to develop a recommended position for presentation to EPA. Strategy and issues involved in responding to this information were discussed, including the structure of the opening plenary session of the Sixth NELAC Interim Meeting (NELAC 6i), scheduled for October 31, 2000 in Las Vegas, NV. Mr. Friedman noted that a course is being developed for introducing regulation-writers to PBMS and offered to share the finished work with ELAB if he can obtain permission to do so. He also noted his concerns with 1) method-specific accreditation, and 2) allowing laboratories to use methods without documenting their data quality.

It was emphasized that a summary of EPA's PBMS implementation strategy is the first step in crafting ELAB's position. It was noted that the States, in developing the NELAC Standard, are responding to EPA's regulations, hence any PBMS implementation must address the current regulatory specifications. Issues to be addressed include scientifically valid approaches to method validation and measurement system characterization.

Dr. Gearhart will expand the subcommittee's membership to include state regulators. It was agreed that the presentation in Las Vegas should summarize both the "state of PBMS" as well as independently propose a workable approach to PBMS. The subsequent open discussion will allow NELAC stakeholders to express their views on how PBMS should be implemented; the subcommittee will use these views in drafting an approach.

Regulatory Consistency Subcommittee

Ms. Zonetta English, chair of this subcommittee, was absent. Mr. Jerry Parr will email his completed review to the ELAB since the comment period for the Hazardous Waste Identification Rule (HWIR) has been extended until October.

3rd-Party Assessor Credentials Subcommittee

Mr. Mark Marcus, chair of this subcommittee, was absent. This subcommittee was disbanded by consensus of ELAB.

Measurement of Source Emissions (MSE) Subcommittee

Mr. Scott Evans, chair of this subcommittee, was absent, possibly due to not being informed of this meeting. Ms. Jeanne Hankins reported that the subcommittee is aware that the documentation requirements of ISO Guide 17025 appear daunting to small organizations, hence there is sentiment to require that an organization be certified unless there is credible evidence of non-compliance. Dr. Hershey will contact subcommittee members to determine their progress.

STATUS OF ELAB RECOMMENDATIONS

Review of ELAB recommendations was tabled for the next meeting of ELAB.

OTHER BUSINESS

AARB Status

Ms. Hankins reported that several changes in the NELAC Accrediting Authority Review Board (AARB) have occurred and encouraged ELAB members to suggest candidates. She noted a desire to have better representation by NELAP accrediting authorities.

ELAB Issues

Dr. Wilson and Dr. Billets reviewed current issues for ELAB, noting the following:

- PBMS implementation in NELAC,
- Privatization of NELAC, and
- Representation of private sector in NELAC voting.

Replacements

Vacancies on ELAB were noted; ELAB members were encouraged to propose candidates to Dr. Billets as soon as possible for consideration.

NEXT MEETING

The next meeting of ELAB is scheduled for November 2, 2000 at the Open Forum in conjunction with NELAC 6i. ELAB's next regular meeting is scheduled for the following day, November 3, 2000.

**ACTION ITEMS
ENVIRONMENTAL LABORATORY ADVISORY BOARD
August 22, 2000**

Item No.	Action	Date to be Completed
1	EPA will reiterate its commitment to the NELAC/NELAP program (Dr. Billets).	
2	The Membership and Outreach committee will be given <ul style="list-style-type: none">• results of the survey (Ms. Taunton), and• the white paper (Mr. Parr, see recommendation #46).	
3	The laboratory community will share available information on impacts of low-concentration samples (e.g., on aluminum, steel, skin) with Mr. Friedman regarding shipment of acid-preserved samples.	
4	Mr. Friedman was encouraged to obtain formal clarification of DOT's sample headspace interpretation.	
5	Dr. Gearhart will expand the PBMS subcommittee's membership to include regulators.	
6	Regarding the PBMS course for regulation-writers, Mr. Friedman will: <ul style="list-style-type: none">• attempt to obtain permission, and• will share the course with ELAB if he possible.	
7	Mr. Parr will Email his completed regulatory consistency review to ELAB for the Hazardous Waste Identification Rule (HWIR).	
8	Dr. Hershey will contact MSE subcommittee members to determine progress.	

ACTION ITEMS
ENVIRONMENTAL LABORATORY ADVISORY BOARD
June 26, 2000

Item No.	Action	Date to be Completed
1.	PBMS Subcommittee will complete critical review of the EPA PBMS Initiative.	11/00
2.	Third-Party Assessor Credentials Subcommittee will complete revised charter.	7/31/00
3.	Scope of Accreditation and QC Standards Subcommittee reports will be posted on the NELAC Website.	
4.	ASSETT will complete draft MSE Standard for ELAB review.	9/1/00
5.	Mr. Friedman will distribute DOT petition packet information to ELAB.	
6.	Ms. Hull will serve as ELAB liaison to the NELAC <i>ad hoc</i> PT subcommittee on PT standardization issues.	Ongoing
7.	Dr. Hershey will draft a letter on behalf of ELAB to Mr. Robert Graves of EPA's Cincinnati office requesting an interim status report on the externalization of the WS/WP PT program.	Completed
8.	ELAB will consider suggestion that they form a subcommittee to examine database needs and make recommendations for the consolidation of the NELAC National Database and PT Database(s) to eliminate redundant information.	
9.	ELAB will revisit issue of mobile laboratory accreditation after implementation of ISO 17025 into NELAC Standards.	
10.	ELAB will recommend that the NELAC Quality Systems Committee assemble a cross-sectional group of microbiologists to give practical input on Appendix D.3.	
11.	ELAB will refer two-tiered states subcontracting issue to NELAP Accrediting Authorities for resolution of apparent conflict.	
12.	Mr. Parr and Mr. Wibby will collaborate with Ms. Hankins to produce an overview of NELAC suitable for presentation to new participants at NELAC meetings.	Completed

**PARTICIPANTS
ENVIRONMENTAL LABORATORY ADVISORY BOARD
AUGUST 22, 1999**

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AUGUST 22, 2000

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Environmental Laboratory Advisory Board (ELAB)

Tuesday, August 22, 2000
1:00 – 4:00 p.m. (EDT)

AGENDA

1. Review August 22 minutes
2. Review action items from August 22 minutes
3. Outreach to states (with Ilona Taunton, Paul Mills)
4. Subcommittee reports by subcommittee chairs
 - Performance Based Measurement Systems
 - Regulatory Consistency
 - Third Party Assessor Credentials
 - Measurement of Source Emissions
5. Update on DOT/EPA sample shipping issues – David Friedman
6. Review/update status of all ELAB recommendations
7. Other business

LISTING & STATUS OF ELAB RECOMMENDATIONS

Priorities Defined

HIGH - activity is an urgent matter; an ELAB member has been assigned to monitor progress on the recommendation

MEDIUM - activity is of importance to ELAB; ELAB will monitor progress periodically

INACTIVE - activity either has been dealt with under another recommendation or is no longer applicable

COMPLETED - recommendation has been addressed or acted upon by ELAB or another organization

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
1	2/6/97	The GLP Subcommittee will present a final report and recommendations at the next ELAB meeting in July, 1997.		ELAB completed report. Awaiting response from EPA EMMC Policy Council. Letter received from EPA/OECA 4/15/99; forwarded letter to NELAC.	COMPLETED
2A	2/6/97	The issue of how to define the basis for NELAC accreditation is of concern to the laboratory community and should continue to be addressed jointly by the NELAC Committees on Proficiency testing and Program Policy and Structure. ELAB participation in the effort will be the responsibility of Mr. Coyner and Ms. Moore, who are members of the Proficiency Testing and Program Policy and Structure Committees, respectively.		Recommendation remains open. Awaiting action from NELAC PT and PPS committees and ELAB members.	INACTIVE
2B	2/6/97	ELAB recommends to EMMC and the NELAC Board of Directors, regarding proficiency testing, that the goal of the NELAC PT program should be to provide full-volume, real-world samples, keeping in mind considerations of practicality and cost.		Recommendation remains open. Awaiting action from NELAC Board and EMMC Policy Council	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
2C	2/6/97	ELAB recommends to EMMC and the NELAC Board of Directors, regarding proficiency testing, that the USEPA serve as the oversight body for the PT program, with the necessary resources and commitment to improve the current system. Alternatively, ELAB recommends that the oversight body be another government organization and that steps be taken to ensure a smooth transition.		Completed - NIST to serve as PTOB	COMPLETED
3	2/6/97	ELAB will recommend to the NELAC Board of Directors that the Program Policy and Structure Committee address the issue of how to recognize an appropriate role for Native American Tribal Nations in NELAC		Recommendation remains open. Awaiting action from NELAC Board and PPS committee	MEDIUM
4	2/6/97	With regard to the role of private-sector accrediting bodies in NELAC, ELAB will recommend to the NELAC Board of Directors that the NELAC national database include publicly available information describing the functions performed by individual private organizations for specific State programs		Recommendation remains open. Awaiting action from NELAC Board	HIGH
5A	2/6/97	ELAB recommends to the EMMC and the NELAC Board of Directors that US EPA's programs and Regions and the States work to implement PBMS consistently.		Recommendation remains open. Awaiting Action from NELAC Board and EMMC Policy Council. Assigned to PBMS subcommittee 12/17/99 D. Friedman (EPA/ORD) made short presentation on PBMS at the 6/28/00 (NELAC VI) ELAB meeting.	HIGH

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
5B	2/6/97	ELAB recommends to the EMMC and the NELAC Board of Directors that training in implementation of PBMS is needed for State Laboratory inspectors		Recommendation remains open. Awaiting action from NELAC Board and EMMC PC. Assigned to PBMS subcommittee 12/17/99.	HIGH
5C	2/6/97	ELAB recommends to the EMMC and the NELAC Board of Directors that a representative from the EMMC Work Group on PBMS work with the ELAB PBMS Subcommittee in the future		L. Williams, L. Autry, and B. Runyon, all from EPA, participated on the PBMS subcommittee	COMPLETED
6	7/28/97	ELAB recommends that EPA prepare a working set of PT sample design criteria which meet Program Office requirements to be used by the Proficiency Testing Oversight Body (PTOB) to include, at a minimum, concentration, interferences, media.	NELAC is working with EPA/EMMC to develop specifications for proficiency testing (PT) sample design criteria for use by the Proficiency Testing Oversight Body (PTOB). EPA is also working with NIST to develop a draft of the standard. The draft is currently awaiting response from EPA	Recommendation remains open. Criteria have been developed for the Water Pollution (WP) and Water Supply (WS) samples. ELAB wishes to reinforce that the recommendation is still important. Awaiting action from EPA Program offices for criteria other than WP and WS. Will be addressed under #39.	INACTIVE

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
7	7/28/97	ELAB recommends that NELAC/NIST/EPA develop a protocol which can be used by the PTOB, through review and analysis of data, to assure program equivalency among PT providers. (See attached paper by Dan Tholen for starting point.) ELAB further recommends that this protocol be finalized as soon as possible to ensure the integrity of this program	The NELAC PT committee has worked with NIST and EPA to produce a draft standard for PTOB to assure equivalence among PT providers. An overview of the draft document, Handbook 150-xx, was given by NIST in the NIST Open Meeting on the morning of 1/16/98. NIST reviewed Handbook 150-xx and requested public comments by 3/15/98. Members of the ELAB were impressed with the draft document and the cooperation with NIST and EPA	Completed. ELAB sent a letter to EPA and NIST complimenting them on their work to date on developing Handbook 150-xx	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
8	7/28/97	ELAB recommends to NELAC that the periodic PT studies occur at fixed times throughout the year. ELAB further recommends that initial and remedial PT samples may be obtained outside this schedule	ELAB has formerly recommended to NELAC that periodic PT studies be conducted at fixed times throughout the year. The problems created by labs not being able to receive or reinstate accreditation due to scheduling were discussed. ELAB is concerned about the effect of having only two opportunities per year for obtaining PT samples, will have on the accreditation process, both initial and remedial. recommends that ensure that the PT system not delay the laboratory accreditation process by more than thirty days.	PT standards have been revised to indicate that accrediting authority may set the schedule. Remedial samples may be obtained	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
9A	7/28/97	ELAB recommends that the long range goal of NELAC be to develop a consistent approach to both scope of accreditation and PT program sample design, which recognizes the needs of the laboratories, the primary accrediting authorities, and the Agency, particularly with regard to performance based methods, similar technologies, and analytical capabilities.	The goal to develop a consistent scope of accreditation and PT programs has been endorsed by the NELAC PT Committee. ELAB discussed the need for the scope of accreditation and PT programs to address performance based measurement systems (PBMS), similar technologies, and analytical capabilities. It was suggested since PBMS is still under development by EPA, NELAC should monitor progress in the program to avoid any delays in the implementation of the NELAC PT program	Recommendation remains open. Awaiting action from NELAC PT and PPS committees. New ELAB subcommittee addressing scope of accreditation issue. Assigned to PBMS subcommittee 12/17/99	ACTIVE
9B	7/28/97	ELAB recommends that the PTOB, during implementation of the PT program, require that each PT provider record and report PT results to both the accrediting authority and the PTOB on a method basis, by matrix and analyte.	NELAC is awaiting EPA specifications for reporting by method, matrix, and analyte. ELAB will recommend that the Proficiency Testing Oversight Body (PTOB) require that each PT provider record and report PT results to both the accrediting authority and to the PTOB to meet the EPA specifications.	Completed. The PT committee's proposed standards for program/matrix/analyte was adopted by NELAC.	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
9C	7/28/97	ELAB recommends to NELAC that a task group monitor the impact on implementation of the discrepancy between PT program design and the scope of accreditation.		Recommendation remains open. Awaiting action from NELAC once program is operational.	INACTIVE
10	7/28/97	ELAB recommends that there is consistency between NELAC Standards and the EPA's PT Externalization program.	NELAC is working closely with EPA and EMMC to insure that NELAC standards are consistent with EPA's PT externalization program. A PT Committee meeting with EMMC in September 1998 indicated close cooperation in developing consistent PT standards.	Issue to be revisited in subsequent meetings.	ACTIVE
11	7/28/97	ELAB recommends that the proposed PT standards (including the Appendices) be adopted as presented.	The recommendation to adopt the proposed PT standards has been accomplished.	Completed.	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
12	7/28/97	<p>ELAB recommends to NELAC that the GLP decisions and the NELAC timeline be decoupled.</p> <p>ELAB further recommends that the GLP subcommittee report to the ELAB at the Interim Meeting with three options including a) status quo; b) Options 1+3+5; and c) lab accreditation.</p> <p>ELAB further recommends that ISO Guide 25 be explicitly considered to understand the value it offers to the GLP process.</p> <p>ELAB further recommends that the NELAC process be evaluated to identify the value added, if any. EPA will provide language to clarify that the NELAC Constitution and Bylaws reflect that decision-making and implementation of the GLP Program will continue as an exclusively federal program.</p> <p>The goal of this activity is to provide information to OECA and OPPTS management for a decision regarding the direction of the GLP program.</p>	Addressed in the GLP report.	Completed. GLP report has been forwarded to EPA - awaiting response from EMMC Policy Council.	COMPLETED
13	7/28/97	<p>ELAB recommends that before EPA promulgates a regulation, it must demonstrate and document that NQOs are achievable using available measurement technology.</p> <p>Recommendations modified to: ELAB recommends that before EPA publishes a method, whether in regulation or guidance, the method must be demonstrated reliable for its stated use.</p>	This recommendation was reconsidered and determined to need modification (see above). This issue was brought to the attention of the EPA Acting Deputy Administrator Peter Robertson on Marcy 9, 1999, at which time he agreed to pursue this issue with the EMMC Policy Council.	<p>Recommendation remains open. Awaiting response from Deputy Administrator.</p> <p>Assigned to PBMS subcommittee 12/17/99.</p>	HIGH

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
14	7/28/97	ELAB recommends that EPA demonstrate that any new or revised regulatory measurement requirements are achievable on samples that represent the same level of analytical challenge as the matrix for which the regulation is intended, that is, don't publish a regulation without a method that works. (Ideally, this would be samples of the actual matrix to be monitored, as defined by the regulation.)	The Board ELAB voted to include an additional clarifying phrase to the recommendation.	Recommendation remains open. Awaiting response from EMMC Policy Council. Assigned to PBMS subcommittee 12/17/99.	HIGH
15	7/28/97	ELAB recommends that EPA consider the following remaining issues: PB Measurement System <u>vs.</u> PB Method Sample matrix Method Validation Method Compliance Interlaboratory Comparability Cost Laboratory Client Relationship		Recommendation has been superceded by final report of the PBMS subcommittee. Assigned to PBMS subcommittee 12/17/99. Waiting on response from Mr. David Friedman.	HIGH
16	7/28/97	ELAB recommends to NELAC that the initial approval of accrediting authorities should occur simultaneously		Completed. The NELAC Transition Committee has implemented this recommendation.	COMPLETED
17	7/28/97	ELAB recommends to NELAC that the first round of NELAC accreditation of laboratories by accrediting authorities should also occur simultaneously.		The NELAC Transition Committee has implemented this recommendation.	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
18	7/28/97	ELAB recommends to NELAC that prior to the designation of approved proficiency test (PT) sample providers as required by Chapter 2, accredited labs should be allowed to continue using existing PT sample providers. However, in the interim, frequency of PT sample analysis as required by Chapter 2 must be met.		Completed. The NELAC Transition Committee has implemented this recommendation. The PT committee has modified the PT chapter to accommodate this recommendation	COMPLETED
19	7/28/97	ELAB recommends to NELAC that Chapter 6 be further defined regarding Accrediting Authority recognition of States to address the conflict of interest between public and private sector labs, with respect to a State laboratory conducting routine environmental testing analyses. Further definition will include the specific guidance to avoid conflict of interest for an above stated Accrediting Authority.	The NELAC Accrediting Authority Committee has implemented this recommendation. At NELAC IV further complaints were raised that the AA committee had not adequately addressed this issue. See NELAC inputs to ELAB 6/30/99. Wording proposed for NELAC standards section 6.2.2.d responds to this concern.		COMPLETED
20	7/28/97	ELAB recommends to NELAC that the issue of primacy State laboratories in accrediting non-primacy State laboratories be referred to the Accrediting Authority Committee for further consideration.		Completed. The NELAC Accrediting Authority Committee has implemented this recommendation.	COMPLETED
21	7/28/97	ELAB strongly recommends to NELAC a vote for adoption of the Standards with modifications as specified and passed by ELAB motions on 7/28/97.		Complete. NELAC adopted the standards.	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
22	7/28/97	ELAB recommends that EPA Program Offices become more active in NELAC and promulgate regulations that are consistent with the NELAC standards as appropriate.	Nancy Wentworth, co-chair of the EMMC Panel on Laboratory Accreditation, discussed the steps that are being taken within the Agency to obtain a consensus opinion. In a meeting on March 9, 1999, the EPA Acting Deputy Administrator Peter Robertson agreed to pursue this.	Recommendation remains open. ELAB sent a letter to the EMMC Policy Council Co-Chairs noting that NELAC is awaiting critical input from EPA Program Offices through EMMC. ELAB encourages the Agency to provide that input in writing as soon as possible. Awaiting response from EMMC Policy Council. Assigned to Regulatory Consistency subcommittee 12/17/99.	HIGH
23	1/16/98	ELAB recommends to NELAC that an advisory appendix be written that addresses the issue of due process for laboratories. This appendix must address the rights, responsibilities, and obligations of the laboratories and accrediting authorities. The discussion should include, but not be limited to: I. the right of the laboratory to see the audit report prior to action; II. the right of the laboratory to privacy during review; III. the right of the laboratory to appeal prior to suspension or revocation; and IV. the right of the laboratory to confidentiality.	Recommendation remains open. Awaiting response from Accreditation Process committee.	Assigned to Z. English 12/17/99	COMPLETED
24	1/16/98	ELAB strongly recommends to NELAC that, during consideration of inclusion of sampling into NELAC standards, all stakeholders be represented.	Recommendation remains open. Awaiting response from Field Measurements ad hoc committee.	This recommendation relates to #41 and will addressed there.	INACTIVE

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
25	1/16/98	ELAB recommends that NELAC invite the Federal Partners Committee to make a report at NELAC IV (7/28/98) on their intention to 1) participate in NELAC; b) continue their own programs; and c) to serve as accrediting authorities.		B. Dutrow made presentation at NELAC IV plenary session on Federal Partners progress.	COMPLETED
26	1/16/98	ELAB recommends that EPA report on the Agency's action regarding PBMS and how it relates to the Quality Systems Chapter.		Awaiting response from EMMC Panel on Laboratory Accreditation. Assigned to PBMS subcommittee 12/17/99	ACTIVE
27A	7/1/98	ELAB recommends that EPA continue the Office of Water streamlining effort as an intermediate step to PBMS.	EPA has decided to develop a formal PBMS program for the Office of Water, separate from the OW streamlining.	Recommendation remains open. Awaiting response from EMMC Policy Council. Assigned to PBMS subcommittee 12/17/99	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
27B	7/1/98	ELAB recommends that a PBMS subcommittee be formed to develop and offer recommendations during NELAC IV [i] for integrating the development of NELAC and PBMS.	ELAB accepted on 12/10/98 the report of the PBMS workgroup as a product of ELAB with the incorporation of previous findings and minor editorial changes. It was decided that a formal ELAB report will be sent by ELAB to EPA with an appropriate cover letter introducing the document and its issues. The PBMS working group report has been submitted to EPA's Acting Deputy Administrator Peter Robertson, during a meeting on 3/9/99, at which time he agreed to address this issue with the EMMC Policy Council.	ELAB PBMS report on ELAB website.	COMPLETED
28	7/1/98	ELAB recommends that the NELAC Program Policy and Structure Committee review the structure of the AARB, consider expanding its charter to include an annual Management Systems Review of NELAP operations by an independent organization, include state members from the accrediting authorities, and address the timing of such reviews.		Recommendation remains open. Awaiting response from PPS committee.	COMPLETED

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
29	7/1/98	ELAB recommends that EPA and the Department of Transportation address the inconsistencies between the EPA preservation requirements and the DOT shipping requirements.	<p>ELAB sent a letter to both EPA and DOT requesting prompt resolution to this impasse. In a meeting on January 11, 1999, the EMMC Policy Council Co-chair Noreen Noonan agreed to pursue this issue.</p> <p>Exemption deemed too narrow and inefficient for our needs. Mr. Friedman has directed contractor to prepare a package to petition DOT to changes its regulations.</p>	<p>Response received from DOT stating that the shipping requirements will not be changed. Awaiting response from EMMC Policy Council.</p> <p>Mr. Friedman sending draft language to DOT to permit exemption of preserved samples.</p> <p>Petition package in development.</p>	HIGH
30	7/1/98	ELAB recommends that the proposed changes to the NELAC standards be adopted in the voting session scheduled for 7/2/98.		Changes adopted.	COMPLETED
31	7/1/98	ELAB recommends that a third-party assessor workgroup be formed to evaluate minimum credentials for third-party assessors, both individuals and organizations. The workgroup will also review NELAC Chapter 6 to determine if the criteria are sufficient for States to evaluate third party assessors and make recommendations for revisions if not.	A work group has been formed chaired by Sandra Wroblewski and Bill Kavanagh.	<p>Awaiting product from work group.</p> <p>Assigned to Third Party Assessor Credentialing subcommittee 12/17/99.</p>	HIGH

Rec #	Date of Rec	Recommendation	Notes	Action	ELAB Priority
32	7/1/98	ELAB recommends that the ELAB Laboratory Assessment workgroup recommendations on checklists be forwarded to the NELAC On-site Assessment Committee for their consideration		Awaiting response from OA committee. Jerry Parr revised report for ELAB review and submission to NELAC. Report approved as final ELAB report for forwarding to NELAC and OA committee 4/29/99. Review of ELAB Laboratory Assessment subcommittee report assigned to J. Parr 12/17/99.	HIGH
33	7/1/98	ELAB recommends that the NELAC Accrediting Authority Committee further define and address conflict of interest between public and private sector laboratories.		Awaiting response from AA committee. This issue will be covered in recommendation 23. Assigned to Z. English 12/17/99	ACTIVE
34	7/1/98	ELAB recommends that the NELAC Accreditation Process committee develop an advisory appendix that addresses the rights, responsibilities, and obligations of laboratories and accrediting authorities.		Awaiting response from Accreditation Process committee. Issue will be covered in recommendation #23. Assigned to Z. English 12/17/99	ACTIVE
35	1/14/99	ELAB recommends that NELAC reach out to laboratory associations through its web page by providing relevant links and sample standard operating procedures, case histories, sample quality manuals, and work sheets to assist small laboratories.			COMPLETED
36	1/14/99	ELAB will ensure a flow of information and guidance to the NELAC Committees by submitting significant information on to the NELAC Membership and Outreach Committee.		Recommendation remains open. Awaiting input from ELAB. W. Hershey to inform M&O committee of FL and KS websites to assist small labs.	INACTIVE

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37	1/14/99	ELAB recommends that NELAC continue to ensure that the NELAC standards contain only essentials to achieve the desired data quality; and, ELAB will make small laboratory issues a standing agenda item for future ELAB meetings.		Recommendation remains open. Awaiting input from ELAB. ELAB continues to include small laboratory issues on agendas.	INACTIVE
38	1/14/99	ELAB recommends to NELAC that the NELAC Accreditation Process and Field Measurements Committees work together to develop a clear definition of critical terms (i.e., field laboratory, mobile laboratory, field measurement, and fixed laboratory) prior to defining the accreditation process for other than fixed laboratories; and, ELAB recommends to NELAC to exclude on-line monitors from its consideration.		Recommendation remains open. Awaiting response from Accreditation Process and FM committees. Assigned to A. Verstuyft, D. McClure 12/17/99. A. Verstuyft asked Mr. Dan Bivins, OAR, to take recommendation to the Field Sampling Committee for their response at June, 2000 meeting (4/11/00).	HIGH
39	1/14/99	ELAB believes the current EPA proficiency testing program for water is unacceptably limited. ELAB recommends that EPA act quickly to broaden the availability of proficiency testing samples for matrices other than water (e.g. solid waste, air, tissue, etc.)	EPA had no plans for oversight beyond WS/WP, so data base not designed to handle broader program.	Recommendation remains open. Awaiting response from EMMC Policy Council ELAB will send letter to EPA's Cincinnati office requesting an interim status report on the externalization of the WS/WP PT program (6/28/00)	HIGH
40	1/14/99	ELAB recommends to NELAC that a) the NELAC standards become effective and enforceable one year after adoption, and b) that for the first group of laboratories to be accredited under NELAC standards, the 1999 standards be used for compliance and that the related timelines for acceptance of applications be adjusted accordingly.		Recommendation remains open. Awaiting response from NELAC Board.	COMPLETED

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41	12/10/98	<p>ELAB recommends that work should forge on for field measurement standards. It was agreed that field sampling should be approached to determine the needs of stakeholders for standard-setting.</p> <p>ELAB recommends that the Field Measurements ad hoc committee compile the variability associated with field sampling, collect field sampling protocols, review ISO guides for approaches, consult stakeholders, and re-visit the needs of EPA/OAR on the matter of field sampling.</p>		<p>Recommendation remains open. Awaiting response from Field Measurements committee.</p> <p>Assigned to A. Verstuyft who will compose a list of key issues for the 4/11/00 teleconference.</p> <p>A. Verstuyft asked Mr. Dan Bivins, OAR, to take recommendation to the Field Measurements Committee for their response at June, 2000 meeting (4/11/00).</p>	HIGH
42	3/1/99	ELAB recommends to NELAC that the lab inspections be done according to NELAC standards and that the national database only track whether a lab is accredited and not have a separate category for interim status.	ELAB, at request of C. Batterton, NELAC BoD, considered the need for a new on-site related to the timing of the first Accrediting Authority recognitions in July 1999.	ELAB letter sent to NELAC, 3/25/99. Awaiting action by NELAC.	COMPLETED
43	12/17/99	Ensure consistency and coordination between USEPA regulations, guidance, and policies and the NELAC standards		Assigned to Regulatory Consistency subcommittee	HIGH
44	12/17/99	ELAB will address reconciliation & integration of ISO and NELAC standards		<p>Assigned to NELAC-ISO Consistency subcommittee</p> <p>Ms. Robinson presented overview comparison of ISO 25 and ISO 17025 at open forum 7/26/00, 2000.</p>	INACTIVE
45	12/17/99	ELAB will review reporting information of NELAC national database			

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46	12/17/99	ELAB will prepare "white paper" on advantages of national laboratory accreditation		Assigned to National Laboratory Accreditation Issues subcommittee	
47	12/17/99	ELAB to review process for developing PT acceptance limits under privatized PT program relative to regulatory requirements		Assigned to NELAC PT committee	
48	12/17/99	ELAB will review NELAC Fields of Testing with respect to EPA's structure		Assigned to Scope of Accreditation subcommittee Subcommittee report summarizing findings has been submitted to ELAB.	
49	12/17/99	ELAB will review issues of QC samples, including field QC and matrix spikes		Assigned to QC Standards subcommittee	COMPLETED
50	2/15/00	ELAB will send letter to Quality Systems Committee asking that Section 5.12.4 be removed from the Standard.		Letter sent. Quality Systems Committee denied request. ELAB is taking issue to Accrediting Authorities Committee meeting on 4/18/00 and Board of Directors meeting on 4/13/00.	COMPLETED
51	5/11/00	ELAB to review proposed Measurement of Source Emissions (MSE) section (7.3) of the proposed Field Activities standard.		MSE subcommittee formed.	
52	6/28/00	ELAB to appoint a liaison to the NELAC PT Committee's <i>ad hoc</i> subcommittee on PT standardization issues.		Assigned to C. Hull 6/28/00	ON-GOING

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53.	6/28/00	ELAB urges NELAC voting members to adopt all proposed NELAC Standards as presented at the sixth annual voting session with the exception of Appendix D.3 to the Quality Systems Standard. ELAB takes no position on Appendix D.3.			COMPLETED
54.	6/28/00	ELAB to review language of proposed air testing appendix to NELAC Quality Systems Standard, especially D.5.0 Introduction, for consistency with stack testing workgroup		Assigned to MSE subcommittee 6/28/00	
55.	6/28/00	ELAB recommends that the NELAC Quality Systems Committee assemble a cross-sectional group of microbiologists (State drinking water and waste water assessors, private and commercial drinking water and waste water laboratories, municipal water systems, EPA personnel responsible for writing the water certification manual, RCRA personnel, etc.) To review and revise the language in Appendix D.3.			HIGH
56.	6/28/00	ELAB recommends that the NELAP Accrediting Authorities consider the two-tiered states subcontracting issue for resolution of apparent conflict.			HIGH